

NICOLA T. HANNA
United States Attorney
BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division
MACK E. JENKINS (Cal. Bar No.242101)
VERONICA DRAGALIN (Cal. Bar No. 281370)
MELISSA MILLS (Cal. Bar No. 248529)
Assistant United States Attorneys
Public Corruption and Civil Rights Section
1500 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-2091
Facsimile: (213) 894-2927
Email: mack.jenkins@usdoj.gov
veronica.dragalin@usdoj.gov
melissa.mills@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LUIS HUIZAR,
RAYMOND SHE WAH CHAN,
aka "She Wah Kwong,"
WEI HUANG,
SHEN ZHEN NEW WORLD I, LLC,
DAE YONG LEE,
aka "David Lee,"
940 HILL, LLC,

Defendants.

No. CR 20-326(A)-JFW-2,4,5,6

STIPULATION RE: PROTECTIVE ORDER
REGARDING DISCOVERY CONTAINING
PERSONAL IDENTIFYING INFORMATION
AND COOPERATING WITNESS
INFORMATION [DKT. 47]

Plaintiff, United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorney Mack E. Jenkins,
Veronica Dragalin, and Melissa Mills, and defendants RAYMOND CHAN,
SHEN ZHEN NEW WORLD I, LLC, DAE YONG LEE, and 940 HILL, LLC, by and

1 through their respective counsel of record, hereby stipulate that
2 defendants CHAN, SHEN ZHEN NEW WORLD I, LLC, LEE, and 940 HILL, LLC,
3 agree to the terms of the Court's August 3, 2020 protective order,
4 Docket No. 47, governing the use of discovery containing personal
5 identifying information and cooperating witness information (the
6 "Protective Order"), along with the following terms:

7 1. Defendant CHAN is charged in this matter with violations
8 of 18 U.S.C. §§ 1962(d) (Racketeering Conspiracy), 1343, 1346
9 (Honest Services Wire Fraud), 666 (Federal Program Bribery), and
10 1001 (False Statements). Defendant SHEN ZHEN NEW WORLD I, LLC is
11 charged with violations of 18 U.S.C. §§ 1343, 1346 (Honest Services
12 Wire Fraud), 1952 (Travel Act violation), and 666 (Federal Program
13 Bribery). Defendants LEE and 940 HILL, LLC are charged with
14 violations of 18 U.S.C. §§ 1343, 1346 (Honest Services Wire Fraud),
15 1519 (Obstruction of Justice), and 666 (Federal Program Bribery).
16 Defendants CHAN and LEE are released on bond pending trial.
17 Defendant WEI HUANG has not yet appeared in the case.

18 Definition of "Defense Team"

19 2. As to defendant SHEN ZHEN NEW WORLD I, LLC, the term
20 "Defense Team" may include attorneys who are not attorneys at
21 defense counsel of record Richard Steingard's law firm, but who
22 represent individuals employed by SHEN ZHEN NEW WORLD I, LLC, or its
23 parent corporation, and who execute a written agreement to be bound
24 by the terms of the Protective Order, to be provided to the
25 government and maintained at Richard Steingard's offices.

26 Paragraph 5 as to Defendant WEI HUANG

27 3. Paragraph 5(g) of the Protective Order outlines the
28 procedures for a defendant to "see and review" Cooperator Material

1 in the presence of the Defense Team. The Protective Order
2 contemplates a member of the Defense Team showing defendant
3 Cooperator Material documents in person, by, for example, referring
4 to defendant not taking material "out of the room." Paragraph 5(h)
5 prohibits defendant from writing down or memorializing any data or
6 information contained in the Cooperator Material.

7 4. WEI HUANG, who is currently located in China, is a
8 corporate representative of defendant SHEN ZHEN NEW WORLD I, LLC,
9 and a named defendant in his personal capacity. Counsel for SHEN
10 ZHEN NEW WORLD I, LLC and the government agree that Paragraph 5(g)
11 prohibits the Defense Team from allowing defendant WEI HUANG to "see
12 and review" Cooperator Material in any way, including via screen-
13 sharing using video-conference platforms such as Zoom, Webex, and
14 VTC. Specifically, defense counsel Richard Steingard agrees that he
15 will not allow defendant WEI HUANG to "see and review" Cooperator
16 Material until defendant WEI HUANG makes an appearance in this
17 district. Any additional attorneys included in the Defense Team, as
18 defined in Paragraph 2, shall also agree to this proscription.

19 Defendant's Agreement

20 5. Defense Counsel Harland Braun has conferred with defendant
21 CHAN regarding this stipulation and Protective Order, and defendant
22 CHAN agrees to the terms of the Protective Order.

23 6. Defense Counsel Richard Steingard has conferred with
24 defendant SHEN ZHEN NEW WORLD I, LLC regarding this stipulation and
25 Protective Order, and defendant SHEN ZHEN NEW WORLD I, LLC, through
26 its corporate representative, agrees to the terms of the Protective
27 Order.
28


7. Defense Counsel Ariel Neuman has conferred with defendants LEE and 940 HILL, LLC regarding this stipulation and Protective Order, and defendant LEE and defendant 940 HILL, LLC, through its corporate representative, agree to the terms of the Protective Order.

IT IS SO STIPULATED.

DATED: December 16, 2020

NICOLA T. HANNA
United States Attorney

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division



MACK E. JENKINS
VERONICA DRAGALIN
MELISSA MILLS
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: December 16, 2020

/s/ via e-mail authorization
HARLAND W. BRAUN
Attorney for Defendant
RAYMOND CHAN

DATED: December 16, 2020

/s/ via e-mail authorization
RICHARD M. STEINGARD
Attorney for Defendant
SHEN ZHEN NEW WORLD I, LLC

DATED: December 16, 2020

/s/ via e-mail authorization
ARIEL A. NEUMAN
JAMES S. THREATT
Attorneys for Defendants
DAE YONG LEE and 940 HILL, LLC